

THE LAW OFFICES OF
RICHARD MALAGIERE
A PROFESSIONAL CORPORATION
www.malagierelaw.com

Richard Malagiere
Member NJ & NY Bar
Registered Patent Attorney
rm@malagierelaw.com

250 MOONACHIE ROAD
SUITE 102
MOONACHIE, NJ 07074
201.440.0675
FAX: 201.440.1843

WHITEHALL BUILDING
17 BATTERY PLACE, STE., 610
NEW YORK, NY 10004
212.879.5580
212.879.5583

OF COUNSEL

Lawrence D. Mandel
Member NJ & PA Bar

Leonard E. Seaman
Member NJ Bar
les@malagierelaw.com

Vincent P. Trovini
Member NJ Bar

***REPLY TO NJ OFFICE**

January 24, 2017

VIA ECF

William T. Walsh, Clerk of Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Ivan McKinny v. Dr. Helmsley
Civil Action No.: 2:14-cv-03564-KM-JBC

Dear Mr. Walsh:

This office represents Defendants, Capt. Pawson, Lt. Pikel, Wardon Bigott, and Capt. Davies in the above-captioned matter. Our clients previously filed a Motion to Dismiss or for a More Definite Statement and to allow Capt. Davies to Answer or otherwise plead out of time. (Dkt. #46)

By letter order dated January 19, 2017, Magistrate Judge Clark granted Capt. Davies' motion for leave to answer or plead. (Dkt # 53) The Order provided the Capt. Davies was to file an answer, move, and/or join in the pending motion within 10 days.

Kindly accept this letter on behalf of Capt. Davies to join in the pending motion to dismiss or for a more definite statements for the reasons set forth in the original moving papers.

Respectfully submitted.

/s/ Leonard E. Seaman
LEONARD E. SEAMAN

LES:ap

Cc: Ivan McKinney (via ECF)
All Counsel (via ECF)
Client (via email)